

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LUCIO CELLI,

Plaintiff,

-against-

**DECLARATION OF
PAUL K. BROWN**

NEW YORK CITY (City Council, Boro Pres, etc.);
UNITED FEDERATION OF TEACHERS; AMERICAN
FEDERATION OF TEACHERS; NYC TEACHER'S
RETIREMENT SYSTEM; NYC DEP'T OF EDUCATION;
JUDGE FRANK; and EEOC/DIAMOND,

Case No.: 1:24-CV-09743-JPC-RWL

Defendants.
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PAUL K. BROWN, an attorney duly admitted to practice before the courts of the State of New York and before this Court, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury that the following is true and correct:

1. I am associated with the law firm Blitman & King LLP, attorneys for Defendant United Federation of Teachers ("UFT" or the "Union") in the above-captioned action.
2. In support of the UFT's motion to dismiss, attached hereto are true and correct copies of the following documents in connection with an arbitration proceeding and state court proceeding referenced and incorporated by reference in the Amended Complaint.

Exhibit "A." Arbitration Award of Arbitrator Timothy S. Taylor, Esq. in *NYCDOE v. Lucio Celli*, NYSED File No. 38,199 (Arb. Taylor, October 19, 2023) (page 2 not filed in prior proceeding and omitted).

Exhibit "B." Decision and Order dated May 9, 2024 in *Lucio Celli v. Taylor, NYC DOE*, Index No. 101118/2023 (Sup. Ct. N.Y. County, May 9, 2024).

Dated: New York, New York
April 14, 2025



Paul K. Brown